

FORM 5

**Submission on notified Proposal for a Policy Statement or Plan, Change or Variation
Submission made under clause 6 of Schedule 1, Resource Management Act 1991**

**To: Dunedin City Council
 PO Box 5045
 Dunedin 9054
 Attn: City Development**

Submitter: Mercy Hospital

1. This is a submission on the following Plan Change (*the proposal*):

Proposed Plan Change 1 to the Partially Operative Dunedin City Second Generation District Plan (“Plan Change”, “Plan Change 1”).

2. Mercy Hospital (“Mercy”) could not gain an advantage in trade competition through this submission.

3. The specific provisions of the proposal that this submission relates to are:

The Plan Change in its entirety, and most specifically:

- *Change CPI High Trip Generators*
- *Change D16 Healthcare*
- *Change Earth1 Temporary Activities*
- *Change Mer1 Setback from Coastal and Waterbodies*

4. PowerNet’s submission is:

The interests that have determined the approach of Mercy in preparing submissions on the Plan Change are described below.

Mercy Hospital is a long-standing charitable entity providing Tertiary level healthcare and Outreach services to the greater Otago and Southland regions. Services include but are not limited to: elective surgery (Day case and Overnight stay), interventional cardiology and chemotherapy. Service provision also directly supports Health New Zealand entities, across the region, though: contracted patient treatments, facility and equipment access

while also acting as a key response provider of emergency service and back -up to Health New Zealand at times of civil emergency.

The Dunedin City Council established a specific zone for Mercy Hospital prior to the 2GP to provide for the hospital and associated activities undertaken by Mercy at its site in Newington Avenue, Māori Hill, Dunedin. At that time, the actual and potential effects of Mercy's operation were carefully considered, and a specific zone and rule framework was developed to enable Mercy's activities whilst appropriately managing effects on neighbours and the wider roading network. A Mercy Hospital Development Plan was included in the zone, providing a building envelope for any future building expansion works to comply with. The Development Plan ensures that the scale of activities at Mercy remain suitable for the site, and any adverse effects are appropriately managed. This zone was transferred into the 2GP as the Mercy Hospital Major Facilities Zone, and again at that time, Council carefully tested the suitability of provisions to ensure the balance between providing for Mercy's activities (now and into the future) and potential effects on neighbours and the surrounding roading network would be appropriately managed. These controls apply in the Mercy Zone in the 2GP and have been working well to manage Mercy's ongoing operation and upgrade activities which provide for the important healthcare service it provides to the Otago and Southland's community.

It is therefore important to ensure that any changes to the 2GP do not impact on Mercy's ability to continue to operate its facilities, and that no additional constraints are imposed.

The particular parts of the Plan Change that Mercy opposes and supports, and the relief sought is outlined in Table 1 in **Annexure A** attached, and this relief seeks to retain Mercy's ability to undertake important healthcare services for Otago and Southland.

In summary, Mercy:

- a) Opposes, opposes in part, supports and supports in part Plan Change 1 as set out in Table 1 in **Annexure A** attached.
- b) The reasons for Mercy's position is that Plan Change 1, as notified and in the absence of amendments (or similar amendments) in accordance with this submission:
 - (i) Will not promote the sustainable management of natural and physical resources, will not achieve the purpose of the Act, and is otherwise contrary to Part 2 and other relevant provisions of the Act, particularly when having regard to the efficiency and effectiveness of the provisions relative to other means;

- (ii) Will not promote the efficient use and development of natural and physical resources;
- (iii) The s32 evaluation is not adequate and does not address the benefits and costs of the Plan Change on Mercy Hospital's activities; and
- (iv) Does not represent sound resource management practice particularly with respect to providing for important healthcare facilities.

5. The Submitter seeks the following decisions from the Dunedin City Council:

- a) The relief sought as set out in Table 1 which is attached as **Annexure A** (or those with similar or like effect) be accepted; and
- b) Such further or other relief as is appropriate or desirable in order to take account of the concerns expressed and relief sought in this submission; and
- c) Any consequential amendments to the 2GP necessary to give effect to a) and b) above and to address the concerns and issues set out in this submission; and
- d) That, in the event that the amendments set out above are not implemented, Plan Change 1 be withdrawn.

6. The Submitter wishes to be heard in support of this submission.

7. If others make a similar submission, the Submitter will consider presenting a joint case with them at the hearing.

Signature:

A handwritten signature in blue ink, appearing to read 'Richard Whitney', with a stylized, looping flourish at the end.

Richard Whitney

Chief Executive Officer, Mercy Hospital

(A signature is not required if you make your submission by electronic means.)

Dated: 13 December 2024

Electronic address for service: louise.taylor@taylorplanning.co.nz

Submission on the Notified Plan Change 1 to the 2GP by Mercy Hospital

Telephone: 027 230 4525

Postal Address:

Taylor Planning Limited

PO Box 12041

Dunedin 9010

Contact Person: Louise Taylor